

## **GROUP EXHIBIT 1**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

JANE DOE,	)	
	)	
Plaintiff,	)	
	)	Case No.:
v.	)	
	)	
RYAN ZEINALPOOR-MOVAHED, an individual	)	
	)	
Defendant.	)	

**INDEX To *Doe v. Movahed*, 22 L 11496 Case Docket**

INDEX PAGE RANGE	CONTENT	FILE DATE
001-002	Case Summary Docket	N/A
004-005	Summons (partial)	12-29-2022
007-016	Complaint	12-29-2022
018	Order granting Petition To Proceed Under A Fictitious Name (Motion filed under seal and not available but referenced in docket)	12-29-2022
020	Notice of Zoom Case Management	01-25-2023
022-024	Return of Service Affidavit – Sheriff King County, Washington	02-01-2023

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*Attorneys for Ryan Zeinalpoor-Movahed*

## District 1

## Case Summary

Case No. 2022Lo11496

Jane Doe -vs- Ryan Zeinalpoor-Movahed

§  
§  
§  
§Location: District 1  
Judicial Officer: Calendar, C  
Filed on: 12/29/2022  
Cook County Attorney Number: 41580

## Case Information

Case Type: Intentional Tort - Jury  
Case Status: 12/29/2022 Open

## Assignment Information

## Current Case Assignment

Case Number 2022Lo11496  
Court District 1  
Date Assigned 12/29/2022  
Judicial Officer Calendar, C




## Party Information

## Lead Attorneys

Plaintiff Doe, Jane

Siehl, Whitney Kendall  
RetainedDefendant Zeinalpoor-Movahed, Ryan  
921 NW 63rd St  
Seattle, WA 98107  
DOB: 04/24/1991

## Events and Orders of the Court

02/28/2023 First Time Case Management (9:30 AM) (Judicial Officer: Durkin, Melissa A.)  
Resource: Location L2203 Court Room 2203  
Resource: Location D1 Richard J Daley Center02/01/2023  Affidavit Of Service Of Summons Outside Illinois Filed  
Affidavit from King County Sheriff of Washington - Return of Service  
Party: Plaintiff Doe, Jane01/25/2023  Electronic Notice Sent  
Party: Plaintiff Doe, Jane  
Party 2: Attorney Siehl, Whitney Kendall01/25/2023  Postcard Generated  
Party: Defendant Zeinalpoor-Movahed, Ryan12/29/2022  Leave To File Under A Fictitious Name-Allowed (Judicial Officer: Flannery, James P)  
Party: Plaintiff Doe, Jane12/29/2022  Impound Exhibits Or Documents - Allowed - (Judicial Officer: Flannery, James P)



District 1

Case Summary

Case No. 2022L011496

Party: Plaintiff Doe, Jane

12/29/2022 New Case Filing

12/29/2022 Intentional Tort Complaint Filed (Jury Demand)

*Complaint at Law*

Party: Plaintiff Doe, Jane

Party 2: Attorney Siehl, Whitney Kendall

12/29/2022 Summons Issued And Returnable

Party: Plaintiff Doe, Jane

Party 2: Attorney Siehl, Whitney Kendall

12/29/2022 Exhibits Filed

*Sealed version of Complaint at Law*

Party: Plaintiff Doe, Jane

Party 2: Attorney Siehl, Whitney Kendall







All Law Clerk Filings are managed by the Illinois Supreme Court and is required to be accepted in all Illinois Circuit Courts.  
 For more information and Zoom Meeting IDs go to [https://www.cookcountycourt.org/HOME/Zoom-Links/Agg4006\\_Sele67Tab/12](https://www.cookcountycourt.org/HOME/Zoom-Links/Agg4006_Sele67Tab/12)  
 Remote Court date: 2/28/2023 9:30 AM

CIRCUIT COURT

Cook

COUNTY

## SUMMONS

FILED  
 12/29/2022 1:09 PM  
 IRIS Y. MARTINEZ  
 CIRCUIT CLERK  
 COOK COUNTY, IL  
 2022L011496  
 Calendar, C  
 20838183

## Instructions ▼

Enter above the county name where the case was filed.

Enter your name as Plaintiff/Petitioner.

Enter the names of all people you are suing as Defendants/Respondents.

Enter the Case Number given by the Circuit Clerk.

Jane Doe

Plaintiff / Petitioner (First, middle, last name)

v.

Ryan Zelnalpoor-Movahed, an Individual

Defendant / Respondent (First, middle, last name)

☐ Alias Summons (Check this box if this is not the 1<sup>st</sup> Summons issued for this Defendant.)

Case Number

## IMPORTANT INFORMATION:

There may be court fees to start or respond to a case. If you are unable to pay your court fees, you can apply for a fee waiver. You can find the fee waiver application at: [illinoiscourts.gov/documents-and-forms/approved-forms/](http://illinoiscourts.gov/documents-and-forms/approved-forms/).

E-filing is now mandatory with limited exemptions. To e-file, you must first create an account with an e-filing service provider. Visit [efile.illinoiscourts.gov/service-providers.htm](http://efile.illinoiscourts.gov/service-providers.htm) to learn more and to select a service provider. If you need additional help or have trouble e-filing, visit [illinoiscourts.gov/faq/gethelp.asp](http://illinoiscourts.gov/faq/gethelp.asp) or talk with your local circuit clerk's office. If you cannot e-file, you may be able to get an exemption that allows you to file in-person or by mail. Ask your circuit clerk for more information or visit [illinoislegalaid.org](http://illinoislegalaid.org).

Call or text Illinois Court Help at 833-411-1121 for information about how to go to court including how to fill out and file forms. You can also get free legal information and legal referrals at [illinoislegalaid.org](http://illinoislegalaid.org).

Plaintiff/Petitioner:

Do not use this form in an eviction, small claims, detinue, divorce, or replevin case. Use the *Eviction Summons*, *Small Claims Summons*, or *Summons Petition for Dissolution of Marriage / Civil Union* available at [illinoiscourts.gov/documents-and-forms/approved-forms](http://illinoiscourts.gov/documents-and-forms/approved-forms). If your case is a detinue or replevin, visit [illinoislegalaid.org](http://illinoislegalaid.org) for help.

If you are suing more than 1 Defendant/Respondent, fill out a *Summons* form for each Defendant/Respondent.

In 1a, enter the name and address of a Defendant/Respondent. If you are serving a Registered Agent, include the Registered Agent's name and address here.

In 1b, enter a second address for Defendant/Respondent, if you have one.

In 1c, check how you are sending your documents to Defendant/Respondent.

## 1. Defendant/Respondent's address and service information:

## a. Defendant/Respondent's primary address/Information for service:

Name (First, Middle, Last): Ryan Zelnalpoor-Movahed

Registered Agent's name, if any:

Street Address, Unit #: 921 NW 63rd Street

City, State, ZIP: Seattle, WA 98107

Telephone: (815) 566-2893

Email: ryanmovahed@gmail.com

## b. If you have more than one address where Defendant/Respondent might be found, list that here:

Name (First, Middle, Last):

Street Address, Unit #:

City, State, ZIP:

Telephone:

Email:

## c. Method of service on Defendant/Respondent:

☐ Sheriff☒ Sheriff outside Illinois: King County, Seattle, WA  
County & State☐ Special process server☐ Licensed private detective



Enter the Case Number given by the Circuit Clerk: \_\_\_\_\_

In 2, enter the amount of money owed to you.

In 3, enter your complete address, telephone number, and email address, if you have one.

2. Information about the lawsuit:  
Amount claimed: \$ 5,000,000.00

3. Contact information for the Plaintiff/Petitioner:

Name (First, Middle, Last): Whitney K. Siehl  
Street Address, Unit #: 455 N. Cityfront Plaza Dr., Suite 2410  
City, State, ZIP: Chicago, IL 60611  
Telephone: (708) 628-4949 Email: WhitneyS@hbsslaw.com

GETTING COURT DOCUMENTS BY EMAIL: You should use an email account that you do not share with anyone else and that you check every day. If you do not check your email every day, you may miss important information, notice of court dates, or documents from other parties.

Important information for the person getting this form

You have been sued. Read all of the documents attached to this *Summons*. To participate in the case, you must follow the instructions listed below. If you do not, the court may decide the case without hearing from you and you could lose the case. *Appearance* and *Answer/Response* forms can be found at: [illinoiscourts.gov/documents-and-forms/approved-forms/](http://illinoiscourts.gov/documents-and-forms/approved-forms/).

Check 4a or 4b. If Defendant/Respondent only needs to file an *Appearance* and *Answer/Response* within 30 days, check box 4a. Otherwise, if the clerk gives you a court date, check box 4b.

In 4a, fill out the address of the court building where the Defendant may file or e-file their *Appearance* and *Answer/Response*.

In 4b, fill out:  
• The court date and time the clerk gave you.  
• The courtroom and address of the court building.  
• The call-in or video information for remote appearances (if applicable).  
• The clerk's phone number and website. All of this information is available from the Circuit Clerk.

4. Instructions for person receiving this *Summons* (Defendant):

- ☐ a. To respond to this *Summons*, you must file *Appearance* and *Answer/Response* forms with the court within 30 days after you have been served (not counting the day of service) by e-filing or at:

Address: 50 W. Washington  
City, State, ZIP: Chicago, IL 60602

- ☒ b. Attend court:  
On: 2/28/23 at 9:30 ☒ a.m. ☐ p.m. in 2203  
Date Time Courtroom

In-person at:

Courthouse Address City State ZIP  
OR

Remotely (You may be able to attend this court date by phone or video conference.

This is called a "Remote Appearance":

By telephone: (312) 624-6779  
Call-in number for telephone remote appearance

By video conference: \_\_\_\_\_  
Video conference website

ID: 922 9774 9842 PSWD: 184216  
Video conference log-in information (meeting ID, password, etc.)

Call the Circuit Clerk at: \_\_\_\_\_ or visit their website  
Circuit Clerk's phone number

at: \_\_\_\_\_ to find out more about how to do this.  
Website

12/29/2022 1:09 PM IRIS Y. MARTINEZ

Witness this Date: \_\_\_\_\_

Clerk of the Court: \_\_\_\_\_

This *Summons* must be served within 30 days of the witness date.

Date of Service: \_\_\_\_\_  
(Date to be entered by an officer or process server on the copy of this *Summons* left with the Defendant or other person.)

STOP!

The Circuit Clerk will fill in this section.

STOP!

The officer or process server will fill in the Date of Service.



Seal of Court







FILED  
12/29/2022 1:09 PM  
IRIS Y. MARTINEZ  
CIRCUIT CLERK  
COOK COUNTY, IL  
2022L011496  
Calendar, C

6-Person Jury

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION

Jane Doe,  
Plaintiff,

vs.

Ryan Zeinalpoor-Movahed,  
an individual,

Defendant.

Case No.:

PLAINTIFF DEMANDS  
TRIAL BY JURY

RECEIVED  
CIVIL  
2022 DEC 30 PM 3:49  
KING COUNTY SHERIFF

COMPLAINT AT LAW

Plaintiff, Jane Doe, against Defendant, Ryan Zeinalpoor-Movahed, an individual,  
complains as follows:

1. This Complaint arises from Defendant's unwanted sexual conduct with Plaintiff including assault, battery, false imprisonment, sexual assault, and rape.
2. Jurisdiction and Venue are proper because the events giving rise to the claim occurred in Cook County, Illinois.
3. Plaintiff is a resident of Washington, D.C.
4. Upon information and belief, Defendant is resident of Seattle, Washington.

**I. FACTS COMMON TO ALL COUNTS**

5. Plaintiff and Zeinalpoor-Movahed visited Chicago in December 2020, as both of their families live in the area. Plaintiff and Zeinalpoor-Movahed were in a dating relationship and had been friends for over a year.
6. On December 29, 2020, Plaintiff and Zeinalpoor-Movahed were staying at Hotel Zachary and went to Sheffield's Beer Garden with three of Zeinalpoor-Movahed's friends.
7. As the night went on, Plaintiff became extremely intoxicated consuming alcohol

at the hotel and restaurant. She is a relatively thin person (5'8" and ~125 pounds) and therefore could become very intoxicated fairly easily.

8. After leaving the restaurant, Zeinalpoor-Movahed invited his friends back to their hotel suite.

9. Plaintiff started feeling nauseous when they were in the car on the way back to the hotel. She rolled the window down for some air to help with the nausea.

10. Plaintiff felt incredibly dizzy, nauseous, and unstable. She sat in front of the toilet in the hotel room bathroom, throwing up repeatedly, and saw vomit on the bed sheets.

11. Plaintiff recalls being in bed confused about what time it was and if the friends were still there. She was still intoxicated and had been throwing up from alcohol consumption for several hours. She realized she was naked, and believed Zeinalpoor-Movahed removed her clothes.

12. Zeinalpoor-Movahed pressed his body against Plaintiff with his full erection on her bottom with his penis near her vaginal opening and repeatedly told her he wanted to "put [his] penis inside [her]." Plaintiff said no. Zeinalpoor-Movahed asked over and over. Plaintiff said "no" to his requests for sex multiple times. She was feeling afraid, exhausted, sore from vomiting, had a terrible stomachache, and was still intoxicated.

13. Zeinalpoor-Movahed continued to pressure Plaintiff to have sex even though she was highly intoxicated. Zeinalpoor-Movahed got on top of Plaintiff and inserted his penis into her vagina. Plaintiff did not consent and just laid there feeling numb and frozen and sick.

14. Through these actions, Zeinalpoor-Movahed imprisoned Plaintiff in the room and sexually assaulted her.



15. Plaintiff was frozen solid in fear and shock. She did not consent, reciprocate, or respond in any way the entire time Zeinalpoor-Movahed was sexually assaulting her. She did not have the strength to push Zeinalpoor-Movahed off her. While Zeinalpoor-Movahed was sexually assaulting her, he told Plaintiff that her "reluctance is a turn on."

16. Zeinalpoor-Movahed sexually assaulted Plaintiff without her consent after she repeatedly said no. He did this knowing she was intoxicated and incapable of consenting to the sexual assault or to resist the sexual assault.

17. Plaintiff woke up the next day feeling absolutely awful and violated by Zeinalpoor-Movahed. She felt shocked, angry, and betrayed.

18. When she confronted Zeinalpoor-Movahed he angrily responded he could not help but get turned on and erect by looking at her or by being in bed with her.

19. During this conversation, Zeinalpoor-Movahed also commented that he had found Plaintiff "passed out" on the bathroom floor. He obviously knew she was incapacitated and unable to consent to sex.

20. Plaintiff Zeinalpoor-Movahed returned to Seattle on December 30, 2020, separately.

21. The sexual assault has been incredibly mentally and emotionally traumatizing for Plaintiff. Recalling that night has triggered panic attacks. Plaintiff was in shock and then felt incredibly disgusted, hurt, and betrayed that Zeinalpoor-Movahed would sexually assault her when she was in a completely vulnerable state.

22. The sexual assault brought on a depression Plaintiff had not experienced before. She was exhausted, sad, and sick to her stomach.

23. After the sexual assault, Plaintiff was diagnosed with PTSD. She has experienced severe panic attacks, including one that resulted in her passing out. She feels anxiety that she might see Zeinalpoor-Movahed and feels like she is constantly looking over her shoulder worried she will encounter him in person.

24. After the assault, Plaintiff took leave from work for over a month to obtain a DVPO and focus on healing. She was unable to think about anything else. Returning to work was challenging as the sexual assault impacted her focus, energy levels, and motivation. Getting caught up with what she missed was challenging and especially difficult in a remote environment.

#### COUNT I

#### **CIVIL BATTERY**

25. Plaintiff Jane Doe restates and incorporates by reference the preceding paragraphs as if fully set forth herein.

26. Defendant Zeinalpoor-Movahed acting intentionally and without provocation and not in self-defense, did commit an unwanted contact with Plaintiff's person or property in a harmful or offensive manner, including, but not limited to, causing sexual contact between Zeinalpoor-Movahed and Plaintiff.

27. Zeinalpoor-Movahed committed an unwanted sexual battery upon Plaintiff without her consent, while she was too intoxicated to consent or resist and Zeinalpoor-Movahed knew that the Plaintiff was unable to give knowing consent.

28. As a direct and proximate result Zeinalpoor-Movahed's battery of Plaintiff, Plaintiff was injured and incurred medical expenses and other economic damages and is obligated to expend sums of money for medical care and attention in an effort to alleviate her

pain and suffering, emotional distress, and mental anguish. She was unable, and continues to be unable, to pursue her usual activities and employment to the same degree, due to her psychological and emotional injuries and damages.

WHEREFORE, Plaintiff, seeks judgment against Defendant, in an amount in excess of the jurisdictional minimum of this Court, and any and all other relief to which she may be entitled.

## COUNT II

### ASSAULT

29. Plaintiff Jane Doe restates and incorporates by reference the preceding paragraphs as if fully set forth herein.

30. Zeinalpoor-Movahed, without cause or provocation, intended to cause reasonable apprehension of an imminent, harmful or offensive conduct against Plaintiff. He did so by approaching the Plaintiff in such a way to make to make her fear imminent bodily harm while she was too intoxicated to consent or resist and Zeinalpoor-Movahed knew that Plaintiff was unable to give knowing consent.

31. Zeinalpoor-Movahed's actions did, in fact, cause Plaintiff to fear imminent harmful or offensive contact by Zeinalpoor-Movahed.

32. As a direct and proximate result of intentional acts, Plaintiff was placed in immediate and reasonable fear for her safety, thereby causing her severe mental anguish and distress, to her detriment.

33. As a direct and proximate result of the above, Plaintiff was injured and incurred medical expenses and other economic damages and is obligated to expend sums of money for medical care and attention in an effort to alleviate her pain and suffering, emotional distress, and



mental anguish. She was unable, and continues to be unable, to pursue her usual activities and employment to the same degree, due to her psychological and emotional injuries and damages.

WHEREFORE, Plaintiff, seeks judgment against Defendant, in an amount in excess of the jurisdictional minimum of this Court, and any and all other relief to which she may be entitled.

### COUNT III

#### **FALSE IMPRISONMENT**

34. Plaintiff Jane Doe restates and incorporates reference the preceding paragraphs as if fully set forth herein.

35. Plaintiff was willfully detained by Zeinalpoor-Movahed, without her consent, while he battered, assaulted and attempted to assault her.

36. Zeinalpoor-Movahed willfully detained Plaintiff through physical force and/or through intimidation.

37. During the time Plaintiff was detained, Plaintiff was too intoxicated to provide any consent and/or to resist, and Defendant groped and inserted his penis in her vagina against her will, and Defendant knew that the Plaintiff was unable to give knowing consent.

38. During her confinement, Plaintiff feared for her safety and was aware Zeinalpoor-Movahed was detaining her.

39. As a result of the aforementioned conduct, Plaintiff has sustained and will sustain physical injury, pain and suffering, serious psychological and emotional distress and mental anguish.

40. As a direct and proximate result of the aforementioned conduct, Plaintiff has incurred medical expenses and other economic damages and is obligated to expend sums of

money for medical care and attention in an effort to alleviate her pain and suffering, emotional distress, and mental anguish. She was unable, and continues to be unable, to pursue her usual activities and employment to the same degree, due to her psychological and emotional injuries and damages.

WHEREFORE, Plaintiff, seeks judgment against Defendant, in an amount in excess of the jurisdictional minimum of this Court, and any and all other relief to which she may be entitled.

**COUNT IV**

**INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

41. Plaintiff Jane Doe restates and incorporates by reference the preceding paragraphs as if fully set forth herein.

42. Zeinalpoor-Movahed's extreme and outrageous conduct intentionally or recklessly caused severe emotional distress to Plaintiff.

43. Zeinalpoor-Movahed's outrageous conduct was not the type of ordinary rude or obnoxious behavior that Plaintiff should be expected to weather. Rather, Zeinalpoor-Movahed's conduct exceeded all possible bounds of decency.

44. Zeinalpoor-Movahed acted with intent or recklessness, knowing there was a high probability that Plaintiff would endure emotional distress. Indeed, he used this distress to subdue and threaten Plaintiff. He did so with deliberate disregard as to the high possibility that severe emotional distress would occur.

45. Zeinalpoor-Movahed's conduct caused emotional suffering for Plaintiff at levels that no reasonable person should have to endure.

46. As a direct and proximate result of the aforementioned conduct, Plaintiff has incurred medical expenses and other economic damages and is obligated to expend sums of money for medical care and attention in an effort to alleviate her pain and suffering, emotional distress, and mental anguish. She was unable, and continues to be unable, to pursue her usual activities and employment to the same degree, due to her psychological and emotional injuries and damages.

WHEREFORE, Plaintiff, seeks judgment against Defendant, in an amount in excess of the jurisdictional minimum of this Court, and any and all other relief to which she may be entitled.

COUNT V

**NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

47. Plaintiff Jane Doe restates and incorporates by reference the preceding paragraphs as if fully set forth herein.

48. Zeinalpoor-Movahed's conduct negligently caused emotional distress to Plaintiff.

49. Zeinalpoor-Movahed had a duty to the Plaintiff.

50. Zeinalpoor-Movahed breached that duty by sexually assaulting Plaintiff.

51. Zeinalpoor-Movahed could reasonably foresee that his action would have caused emotional distress to Plaintiff.

52. Plaintiff was in a specific zone of danger with Zeinalpoor-Movahed and at risk of physical harm, causing her fear.

53. Plaintiff, immediately or shortly after the assault by Zeinalpoor-Movahed, suffered distress and emotional harm.



54. As a direct and proximate result of the aforementioned conduct, Plaintiff has incurred medical expenses and other economic damages and is obligated to expend sums of money for medical care and attention in an effort to alleviate her pain and suffering, emotional distress, and mental anguish. She was unable, and continues to be unable, to pursue her usual activities and employment to the same degree, due to her psychological and emotional injuries and damages.

WHEREFORE, Plaintiff, seeks judgment against Defendant, in an amount in excess of the jurisdictional minimum of this Court, and any and all other relief to which she may be entitled.

COUNT VI

**GENDER VIOLENCE ACT (740 ILCS 82/1, et seq.)**

55. Plaintiff Jane Doe restates and incorporates by reference the preceding paragraphs as if fully set forth herein.

56. At all times relevant, there was in effect the Gender Violence Act (740 ILCS 82/1, et seq. (the "Act")), which defines "gender-related violence," which is a form of sex discrimination, as:

- 1) "One or more act of violence or physical aggression satisfying the elements of batter under the laws of Illinois that are committed, at least in part, on the basis of the person's sex..."
- 2) "A physical intrusion or physical invasion of a sexual nature under coercive conditions satisfying the elements of batter under the laws of Illinois..."
- 3) "A threat of an act described in (1) or (2) causing a realistic apprehension that the originator of the treat will commit the act."

57. For purposes of the Act, "perpetrating means either personally committing the

gender-related violence or personally encouraging or assisting the act or acts of gender-related violence.”

58. Defendant Zeinalpoor-Movahed perpetrated gender related violence by willfully, wantonly subjecting Jane Doe to gender violence as described above, including assault, battery, false imprisonment, sexual assault, and rape with a conscious disregard for her safety and well-being.

59. As a proximate result of the willful and wanton violations of the Act, as set forth above, Jane Doe suffered injuries, pain and suffering, emotional distress, and mental anguish.

WHEREFORE, Plaintiff Jane Doe asks that a judgement be entered against the Defendant, for a fair and just amount in excess of the jurisdictional minimum of this Court, plus attorney's fees and costs as provided for by the statute, and all other relief to which Plaintiffs may be entitled.

By: Whitney K. Siehl  
Whitney K. Siehl

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shelby@hbsslaw.com  
*Attorneys for Plaintiff*







IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS COUNTY  
DEPARTMENT, LAW DIVISION

JANE DOE,  
Plaintiff,  
  
v.  
Ryan Zeinalpoor-Movahed,  
an individual,  
Defendant.

No. 22L11496

ORDER

This matter coming to be heard on Plaintiff's Petition to Proceed under a Fictitious Name, the Court being fully advised finds as follows:

Pursuant to *In re Marriage of Johnson*, 232 Ill. App. 3d 1068 (4<sup>th</sup> Dist. 1992), the Court has balanced Plaintiff's right to privacy against the public's right of access to open court proceedings. Plaintiff contends there is a compelling interest because this lawsuit involves matters of a highly sensitive and personal nature, including gender-related violence and sexual abuse, and Plaintiff will suffer needless humiliation, embarrassment, harassment and additional injuries if her identity is made public. 4381

The Court finds there is a compelling interest that favors Plaintiff's right to privacy in keeping her name from the public and such right is superior to the public's right of access to an open proceeding. *See Doe v. Doe*, 282, Ill App. 3d 1078, 1088 (1st Dist. 1996).

The Court further finds that the privacy issue involved shall be protected in the least restrictive way possible. The Court finds that the least restrictive way to protect the privacy of Plaintiff is by proceeding under a fictitious name. 4245

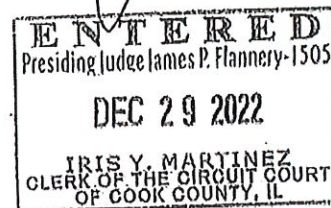
This order may be reconsidered if Plaintiff takes any steps to make Plaintiff's name known to the public and shall be reconsidered by the trial judge at the time of jury selection.

Plaintiff shall file a copy of the Complaint with Plaintiff's actual name under seal with the Clerk of the Court and to remain under seal until further order of the Court.

ENTERED:

*[Signature]* 1585

Atty No. 41580  
Name Hagens Berman Sobol Shapiro LLP  
Attorney for Plaintiff  
Address 455 N. Cityfront Plaza Drive, Suite 2410  
City Chicago, Illinois 60611









CIRCUIT COURT OF COOK COUNTY  
LAW DIV. RM. 801, DALEY CENTER.  
CHICAGO IL-60602

Doe Jane

-  
whitneys@hbsslaw.com

NOTICE OF ZOOM CASE MANAGEMENT

CASE: 2022L011496 / Jane Doe -vs- Ryan Zeinalpoor-Movahed

This cause is scheduled for initial case management via Zoom  
before Judge, Durkin, Melissa A. On Tuesday February 28 2023 at 09:30 AM

**\*\* DO NOT APPEAR IN PERSON \*\***

To access Zoom by video go to <https://zoom.us/join> then  
enter the access code and password listed below.

ZOOM ACCESS CODE: 922 9776 9842 PASSWORD: 184216

To access Zoom by phone, call 312-626-6799 and then enter  
the access code and password listed above.

For all questions or inability to access Zoom on the initial CMC  
date, email: LAW.CALCcc@cookcountyil.gov or phone: (312) 603-6062

You cannot access Zoom until your scheduled hearing date.

All attorneys of record and self-represented litigants are  
required to appear via Zoom and advise the court as to the status of the case.





Hearing Date: No hearing scheduled  
 Location: <<CourtRoomNumber>>  
 Judge: Calendar, C



RETURN OF SERVICE

FILED  
 2/1/2023 12:24 PM  
 IRIS Y. MARTINEZ  
 CIRCUIT CLERK  
 COOK COUNTY, IL  
 2022L011496  
 Calendar, C  
 21289373

00592749/rl

STATE OF WASHINGTON )

ss.

COUNTY OF KING )

JANE DOE

vs.

RYAN ZEINALPOOR-MOVAHED

NO. 2022L011496 CIRCUIT COURT OF COOK  
 COUNTY - ILLINOIS

PROCESS: Summons; Complaint at Law

DATE RECEIVED: 12/30/2022  
 DATE SERVED: 1/19/2023 @ 11:40 AM  
 DATE OF RETURN: 1/20/2023  
 NAMED PARTY: RYAN ZEINALPOOR-MOVAHED

I, BEN WHEELER, BEING FIRST DULY SWORN, UPON OATH, DEPOSE AND STATE THAT I AM A CITIZEN OF THE UNITED STATES, A CITIZEN AND RESIDENT OF THE STATE OF WASHINGTON, OVER THE AGE OF EIGHTEEN YEARS, NOT A PARTY TO, NOR INTERESTED IN ANY WAY IN THIS ACTION, AM COMPETENT TO BE A WITNESS THEREIN. I AM A DULY APPOINTED, QUALIFIED DEPUTY SHERIFF OF THE KING COUNTY SHERIFF'S OFFICE, KING COUNTY, STATE OF WASHINGTON, AND WAS SUCH DEPUTY SHERIFF AT ALL TIMES HEREIN MENTIONED. UNDER THE STATUTES OF THE STATE OF WASHINGTON, A DEPUTY SHERIFF POSSESSES THE POWER TO PERFORM CERTAIN DUTIES PRESCRIBED BY LAW TO BE PERFORMED BY THE SHERIFF, INCLUDING SERVING OR EXECUTING ACCORDING TO LAW ALL PROCESS, WRITS, PRECEPTS, AND ORDERS ISSUED OR MADE BY LAWFUL AUTHORITY AND TO HIM DIRECTED.

I RECEIVED THE ABOVE-NAMED PROCESS AND PERSONALLY SERVED A TRUE COPY OF SAID PROCESS UPON THE NAMED PARTY, RYAN ZEINALPOOR-MOVAHED, ON THE DATE ABOVE SPECIFIED,

AT 921 NW 63RD STREET SEATTLE, WA 98107 IN SAID KING COUNTY.

SHERIFF PATRICIA COLE-TINDALL  
 KING COUNTY SHERIFF'S OFFICE

BY

BEN WHEELER

KING COUNTY DEPUTY SHERIFF

516 3<sup>rd</sup> AVENUE ROOM W-150

SEATTLE, WA 98104

TELEPHONE: (206) 263-2600

FAX: (206) 296-0918

E-MAIL: [Civil.KCSO@kingcounty.gov](mailto:Civil.KCSO@kingcounty.gov)

SHERIFF'S FEES

Mileage (\$6.00)  
 Return of Service (\$28.00)  
 Service Fee (\$36.00)  
 Total: \$70.00

All Law Division Title Forms are prepared by the Illinois Supreme Court and is required to be accepted in all Illinois Circuit Courts.  
 For more information and Zoom Meetings, IDs go to <https://www.cookcountycourt.org/HOME/Zoom-Links/Agg4906/SelectTab/12>  
 Remote Court date: 2/28/2023 9:30 AM

Cook COUNTY

## SUMMONS

FILED  
 12/29/2022 1:09 PM  
 IRIS Y. MARTINEZ  
 CIRCUIT CLERK  
 COOK COUNTY, IL  
 2022L011496  
 Calendar, C  
 20838183

## Instructions ▼

Enter above the county name where the case was filed.

Enter your name as Plaintiff/Petitioner.

Enter the names of all people you are suing as Defendants/Respondents.

Enter the Case Number given by the Circuit Clerk.

Jane Doe

Plaintiff / Petitioner (First, middle, last name)

v.

Ryan Zeinalpoor-Movahed, an Individual

Defendant / Respondent (First, middle, last name)

☐ Alias Summons (Check this box if this is not the 1<sup>st</sup> Summons issued for this Defendant.)

Case Number

RECEIVED  
 CIVIL  
 2022 DEC 30 PM 3:49  
 KING COUNTY SHERRIFF

## IMPORTANT INFORMATION:

There may be court fees to start or respond to a case. If you are unable to pay your court fees, you can apply for a fee waiver. You can find the fee waiver application at: [illinoiscourts.gov/documents-and-forms/approved-forms/](https://illinoiscourts.gov/documents-and-forms/approved-forms/).

E-filing is now mandatory with limited exemptions. To e-file, you must first create an account with an e-filing service provider. Visit [e-file.illinoiscourts.gov/service-providers.htm](https://e-file.illinoiscourts.gov/service-providers.htm) to learn more and to select a service provider. If you need additional help or have trouble e-filing, visit [illinoiscourts.gov/filinghelp.asp](https://illinoiscourts.gov/filinghelp.asp) or talk with your local circuit clerk's office. If you cannot e-file, you may be able to get an exemption that allows you to file in-person or by mail. Ask your circuit clerk for more information or visit [illinoislegalaid.org](https://illinoislegalaid.org).

Call or text Illinois Court Help at 833-411-1121 for information about how to go to court including how to fill out and file forms. You can also get free legal information and legal referrals at [illinoislegalaid.org](https://illinoislegalaid.org).

## Plaintiff/Petitioner:

Do not use this form in an eviction, small claims, detinue, divorce, or replevin case. Use the *Eviction Summons*, *Small Claims Summons*, or *Summons Petition for Dissolution of Marriage / Civil Union* available at [illinoiscourts.gov/documents-and-forms/approved-forms/](https://illinoiscourts.gov/documents-and-forms/approved-forms/). If your case is a detinue or replevin, visit [illinoislegalaid.org](https://illinoislegalaid.org) for help.

If you are suing more than 1 Defendant/Respondent, fill out a *Summons* form for each Defendant/Respondent.

In 1a, enter the name and address of a Defendant/Respondent. If you are serving a Registered Agent, include the Registered Agent's name and address here.

In 1b, enter a second address for Defendant/Respondent, if you have one.

In 1c, check how you are sending your documents to Defendant/Respondent.

## 1. Defendant/Respondent's address and service information:

## a. Defendant/Respondent's primary address/information for service:

Name (First, Middle, Last): Ryan Zeinalpoor-Movahed

Registered Agent's name, if any: \_\_\_\_\_

Street Address, Unit #: 921 NW 63rd StreetCity, State, ZIP: Seattle, WA 98107Telephone: (815) 566-2893 Email: ryanmovahed@gmail.com

## b. If you have more than one address where Defendant/Respondent might be found, list that here:

Name (First, Middle, Last): \_\_\_\_\_

Street Address, Unit #: \_\_\_\_\_

City, State, ZIP: \_\_\_\_\_

Telephone: \_\_\_\_\_ Email: \_\_\_\_\_

## c. Method of service on Defendant/Respondent:

☐ Sheriff☒ Sheriff outside Illinois: King County, Seattle, WA  
County & State☐ Special process server☐ Licensed private detective



Enter the Case Number given by the Circuit Clerk: \_\_\_\_\_

In 2, enter the amount of money owed to you.

2. Information about the lawsuit:  
Amount claimed: \$ 5,000,000.00

In 3, enter your complete address, telephone number, and email address, if you have one.

3. Contact information for the Plaintiff/Petitioner:

Name (First, Middle, Last): Whitney K. Siehl  
Street Address, Unit #: 455 N. Cityfront Plaza Dr., Suite 2410  
City, State, ZIP: Chicago, IL 60611  
Telephone: (708) 628-4949 Email: WhitneyS@hbsslaw.com

**GETTING COURT DOCUMENTS BY EMAIL:** You should use an email account that you do not share with anyone else and that you check every day. If you do not check your email every day, you may miss important information, notice of court dates, or documents from other parties.

**Important information for the person getting this form**

You have been sued. Read all of the documents attached to this *Summons*. To participate in the case, you must follow the instructions listed below. If you do not, the court may decide the case without hearing from you and you could lose the case. *Appearance* and *Answer/Response* forms can be found at: [illincourts.gov/documents-and-forms-approved-forms](http://illincourts.gov/documents-and-forms-approved-forms).

Check 4a or 4b. If Defendant/Respondent only needs to file an *Appearance* and *Answer/Response* within 30 days, check box 4a. Otherwise, if the clerk gives you a court date, check box 4b.

In 4a, fill out the address of the court building where the Defendant may file or e-file their *Appearance* and *Answer/Response*.

In 4b, fill out:  
• The court date and time the clerk gave you.  
• The courtroom and address of the court building.  
• The call-in or video information for remote appearances (if applicable).  
• The clerk's phone number and website. All of this information is available from the Circuit Clerk.

4. Instructions for person receiving this *Summons* (Defendant):

- ☐ a. To respond to this *Summons*, you must file *Appearance* and *Answer/Response* forms with the court within 30 days after you have been served (not counting the day of service) by e-filing or at:

Address: 50 W. Washington Street  
City, State, ZIP: Chicago, IL 60602

- ☒ b. Attend court:

On: 2/28/23 at 9:30 ☒ a.m. ☐ p.m. in 2203  
Date Time Courtroom

In-person at:

Courthouse Address City State ZIP

OR

**Remotely** (You may be able to attend this court date by phone or video conference.)

This is called a "Remote Appearance":

By telephone: (312) 626-6799  
Call-in number for telephone remote appearance

By video conference: \_\_\_\_\_  
Video conference website

ID: 922 9776 9849 Pswd: 184216  
Video conference log-in information (meeting ID, password, etc.)

Call the Circuit Clerk at: \_\_\_\_\_ or visit their website

at: \_\_\_\_\_ to find out more about how to do this.  
Website

12/29/2022 1:09 PM IRIS Y. MARTINEZ

Witness this Date: \_\_\_\_\_

Clerk of the Court: \_\_\_\_\_

This *Summons* must be served within 30 days of the witness date.

Date of Service: \_\_\_\_\_  
(Date to be entered by an officer or process server on the copy of this *Summons* left with the Defendant or other person.)



Seal of Court

**STOP!**  
The Circuit Clerk will fill in this section.

**STOP!**  
The officer or process server will fill in the Date of Service.